



Supporting Statement

Certificate of Lawfulness for the stationing of a caravan,
including associated fixing and service connections and its
use as ancillary accommodation incidental to the main
residential property 1 West Wantley Cottages

at

1 West Wantley Cottages
Fryern Road
Storrington
RH20 4BJ

On Behalf of
Mr & Mrs Doe

Prepared by
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01798 877555

March 2026

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1 INTRODUCTION

- 1.1 This report is submitted in support of an application for a Certificate of Lawfulness (Existing Use or Development) under Section 191 of the Town and Country Planning Act 1990 (as amended) for the for the stationing of a caravan, including associated fixing and service connections and its use as ancillary accommodation incidental to the main residential property 1 West Wantley Cottages.
- 1.2 The caravan has been continuously stationed and occupied as ancillary accommodation associated with the main dwelling since July 2019, a period exceeding four years prior to this application.
- 1.3 The operational development involved the siting, anchoring, and connection to mains services (electricity, water, and drainage). These physical works were substantially completed before 24 April 2024 and are therefore immune from enforcement under Section 171B(1) of the Act, the former four year rule applicable to operational development completed before that date.
- 1.4 The purpose of this statement is to demonstrate, on the balance of probability, that the siting and associated operational works of the caravan have achieved lawfulness and is immune of enforcement action.

2 TESTS AND CONSIDERATIONS

- 2.1 The National Planning Policy Guidance states that it is the applicant's responsibility to provide sufficient information to support a Certificate application. In the case of applications for existing use, if a local planning authority has no evidence itself, nor any from others, to contradict or otherwise make the applicant's version of events less than probable, there is no good reason to refuse the application, provided the applicant's evidence alone is sufficiently precise and unambiguous to justify the grant of a certificate on the balance of probability.
- 2.2 The Planning and Compensation Act 1991 introduced rolling time limits within which local planning authorities can take planning enforcement action against breaches of planning control. At the time the works were carried out and completed, Section 171B of the Act provided that operational development becomes lawful if no enforcement action is taken within four years of the date on which the development was sustainably completed.
- 2.3 Section 191(5) of the Act sets out the information required to be submitted with a Certificate of Lawfulness of existing use or development application, which includes the following:
- a) the land to which it relates;
 - b) a description of the use, operations or other matter in question;
 - c) the reasons for determining the use, operations or other matter to be lawful;
 - and
 - d) the date of the application for the certificate.
- e) This information is provided within this report and application documents.

3 HISTORY OF USE

- 3.1 The applicants Mr and Mrs Doe purchased the property 1 West Wantley Cottages on 27th June 2019.
- 3.2 In July 2019 the applicants purchased a mobile home which was brought onto site and located within the residential curtilage of 1 West Wantley Cottages. A dated photo confirming the caravan being brought onto site is shown in Figure 3.1.

Figure 3.1 – Caravan Arriving to Site on 3rd July 2019



- 3.3 The caravan was sited on an area of existing hardstanding to the rear of the residential garden as shown in Figure 3.2 and anchored to the ground and connected to services such as water, electricity and waste. A photo showing the caravan attached to the ground permanently is shown in Figure 3.3.

Figure 3.2 – Site Plan



Figure 3.3 – Photo Showing Caravan Attached to Ground



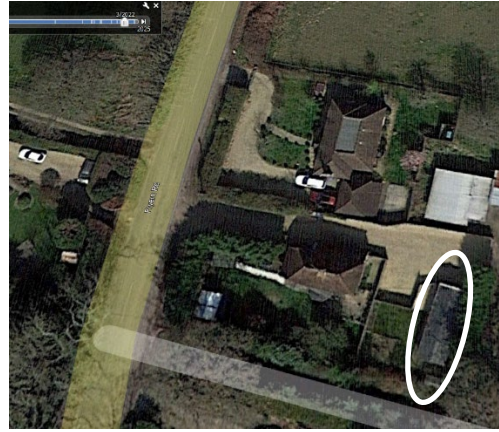
- 3.4 Photos to confirm the caravan being in position since July 2019 is confirmed by the attached statutory declarations as well as Google Earth imagery.

Figure 3.3 - Google Earth Imagery

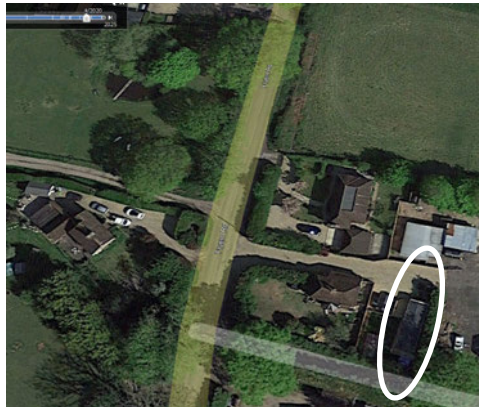
Google Earth June 2025



Google Earth March 2022



Google Earth – April 2020



- 3.5 Since July 2019 at all times the caravan has been occupied solely by family members of the main household. The unit shares the principal dwelling's curtilage, parking, and garden; and although it has independent connections to utilities, main meals and daily living are centred within the main dwelling.
- 3.6 It therefore functions as ancillary accommodation rather than an independent residential use or a separate planning unit.

4 SUBMISSIONS AND EVIDENCE

- 4.1 As set out in Section 2, the test to satisfy in relation to Certificate applications for existing uses is 'on the balance of probability' provided the applicant's evidence is sufficiently precise and unambiguous.
- 4.2 Attached to this application are signed statutory declarations from members of the applicant's family namely Mr P Parfitt, Mrs M Parfitt and Mr M Doe and which confirm their knowledge of the caravan being on site since July 2019 to the present day and its use as ancillary use to 1 West Wantley Cottages.
- 4.3 The applicants were previously written to on the 5th June 2023 by Sam Nye of Horsham District Council's enforcement team reference EN23/0110 relating to the caravan and its use. The investigation subsequently closed on the 27th June 2023 with the council being satisfied that the caravan was being used for auxiliary purposes relating to 1 West Wantley Cottages which remains that way to the present day. This therefore confirms the caravans existence and use on since in June 2023. A copy of the communication with Council can be found attached to Appendix B.
- 4.4 As set out in Section 3 at the time the works were carried out and completed, Section 171B of the Act provided that operational development becomes lawful if no enforcement action is taken within four years of the date on which the development was substantially completed.
- 4.5 All works associated with the siting of the caravan and any related operational development were completed prior to 24 April 2024. Accordingly, the former four-year rule applies, and the development is now immune from enforcement action. This operational development has been evidenced by the caravan being permanently fixed to the ground and being connected to services and is therefore not considered a moveable structure.
- 4.6 Photographic evidence provided by the applicants confirms that the caravan was brought onto the site in July 2019. This is corroborated by Google Earth imagery dated between 2020 and 2025, which demonstrates that the caravan has remained continuously in situ for a period in excess of four years. The completion of the associated operational works is further evidenced by correspondence with

Horsham District Council dated June 2023, confirming that the caravan was present on the site at that time and that the works had been completed prior to 24 April 2024.

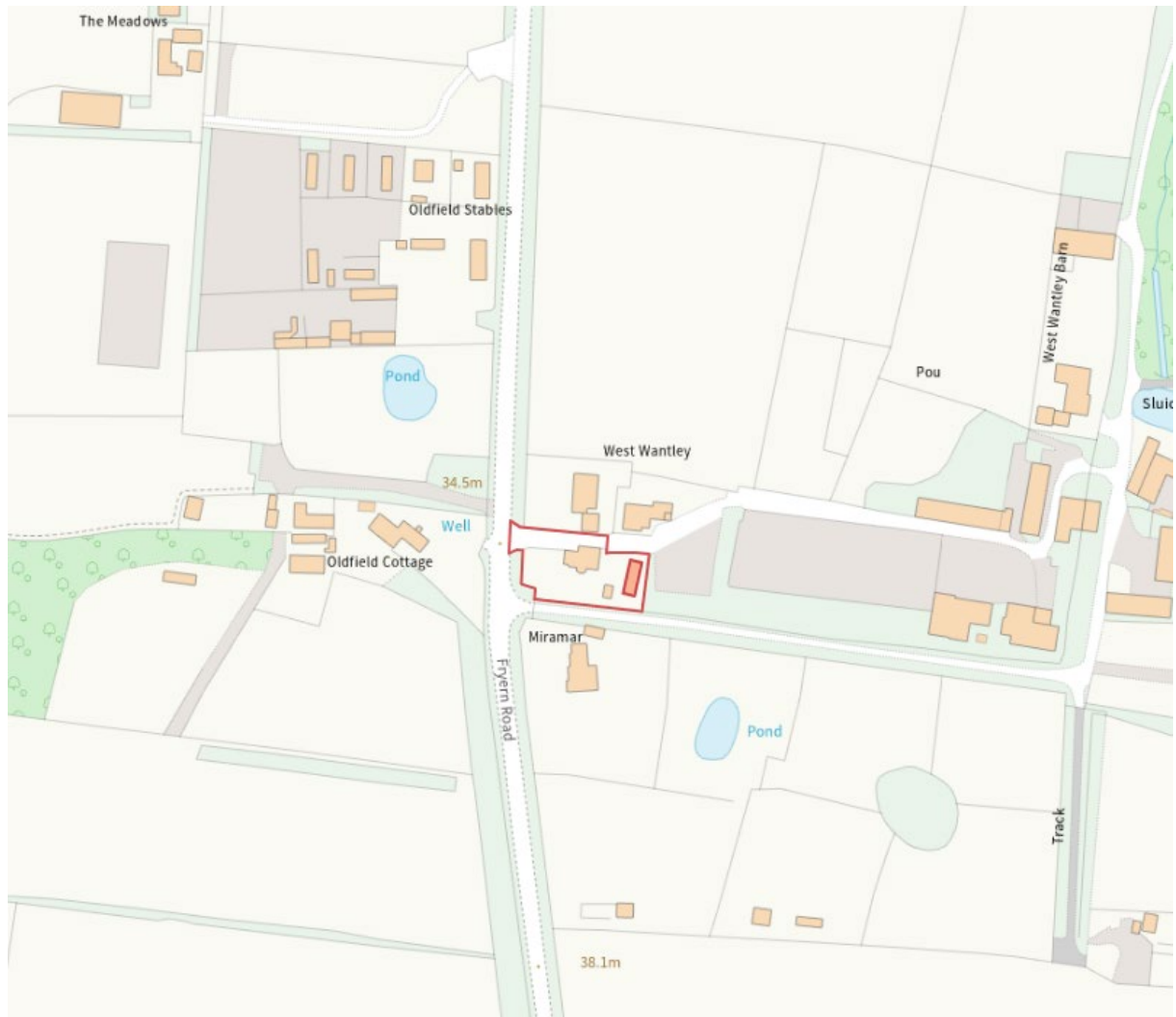
- 4.7 It is well established in case law that the stationing of a caravan may amount to “operational development” where works are carried out which physically attach the structure to the land and indicate an intention for it to remain permanently in situ (Wealden DC v Secretary of State for the Environment & Day). In this case, the caravan has been sited on an established area of hardstanding, securely fixed to the ground, and connected to mains water, electricity and drainage. These works go beyond the mere placing of a moveable object on land and demonstrate that the caravan has been physically incorporated into the land for long-term use within the residential curtilage as ancillary accommodation. As such, the stationing of the caravan constitutes operational development for the purposes of planning control and is capable of benefiting from the relevant statutory time limits for enforcement.

5 SUMMARY

- 5.1 This statement supports an application for a Certificate of Lawfulness (Existing Use or Development) under Section 191 of the Town and Country Planning Act 1990 in respect of the stationing of a caravan, including associated fixing and service connections and its use as ancillary accommodation incidental to the main residential property 1 West Wantley Cottages, Fryern Road, Storrington.
- 5.2 The evidence confirms that the caravan was brought onto the site in July 2019, sited on existing hardstanding, permanently fixed to the ground and connected to mains services. These works constitute operational development which was substantially completed in July 2019. No enforcement action was taken within four years of completion, and the development is therefore lawful under Section 171B(1) of the Act.
- 5.3 The evidence further demonstrates that, since July 2019, the caravan has been occupied solely by members of the household associated with the main dwelling and has at all times functioned as ancillary accommodation. It shares the curtilage, access and facilities of the main dwelling and does not comprise a separate planning unit or independent residential use.
- 5.4 The application is supported by dated photographs, Google Earth imagery, statutory declarations and correspondence from Horsham District Council. Taken together, this evidence is sufficiently precise and unambiguous to demonstrate, on the balance of probability, that the operational development and associated ancillary use are lawful.
- 5.5 The Certificate of Lawfulness should therefore be granted.

Appendix A

Site Location Plan



Appendix B

Previous Correspondence with HDC Regarding Caravans Use

From: "Sam Nye" [redacted]
Date: Tuesday, 27 June 2023 at 17:14
To: Keith Potts [redacted]
Subject: FW: West Wantley Farm, Fyern Road, Storrington, West Sussex - Reference EN/23/0110

Good Afternoon Keith,

Thank you for the email below and attached letter sent through Wendy. My apologies for the delayed response however I have been conducting further research.

Having read through your letter detailing your and your client's stance regarding each of the breaches and following your own site visit, I am satisfied that no site visit is required on my behalf.

In regards to the siting of the caravans on the land for residential occupation, I am satisfied that from my visits driving past and no further complaints being received, this part of the complaint can be closed. I can see from the social media pages attached to West Wantley Farm, there has been no further advertisement in regards to glamping facilities on the site.

In regards to the car boot sales operating from the land, I can also see there has been no further advertisement since around September 2022 and so I am happy that this use has now ceased.

In regards to the commercial use of stables and sand school, I have noted that the advertisements for the sand school and stables facilities for hire, have now ceased and no further adverts have been seen since March 2022. Thank you for confirming that Mrs Doe does not intend to pursue this matter any further however you are currently exploring the possibility of submitting an application for restrictive use, if the demand does arise.

I can see however there is still some advertisement regarding commercial use of the stables and sand school, in respect of the activity 'Pony Parties With Dolly'. Looking at the website, the address given is West Wantley Farm and the photos from this website and attached social media pages, show the stables and sand school being used for this activity. Whilst I believe it is clear this is still occurring, I am satisfied that as this is the only activity occurring on site, it is not of the level that I would consider a material change of use has occurred.

In respect of the above and following my own research, I am satisfied that this compliance investigation can now be closed and I'd be grateful if you could pass this onto your clients.

Thank you for your assistance in this case and please get in touch if there are any further questions.

Kind Regards

Sam Nye
Planning Compliance Officer
Telephone: 01403 215066 | 07920 807560
Email: Sam.Nye@horsham.gov.uk




Horsham District Council, Parkside, Chant Way, Horsham, West Sussex RH12 1RL
Telephone: 01403 215100 (calls may be recorded) | www.horsham.gov.uk | Chief Executive: Jane Eaton

ITPS *Independent Town Planning Services*

KCP/IT352/wjs 50 Springfield Road, Horsham, West Sussex RH12 2PD 14th June 2023
tel: 01403 733777 email kpotts@churchlands.co.uk

Mr S Nye
Planning Compliance Officer
Horsham District Council
Parkside
Chart Way
HORSHAM RH12 1RL

Dear Mr Nye

Re: West Wantley Farm, Fryern Road, Storrington, West Sussex
Your Reference: EN23/0110

I refer to your letter of 5th June 2023 to Mr & Mrs Doe who are long standing clients of my Planning Practice and who over the years I have advised on various planning matters that have arisen in respect of their property and businesses.

I was forwarded a copy of your letter which alleges various potential breaches of Planning Control, these being listed under item 1-3 in your communication.

I visited the property on Friday 8th June to consider the alleged proposed breaches following which Mr & Mrs Doe have asked that I communicate with you directly on these matters as they are now away on a planned holiday trip for the next 3 weeks.

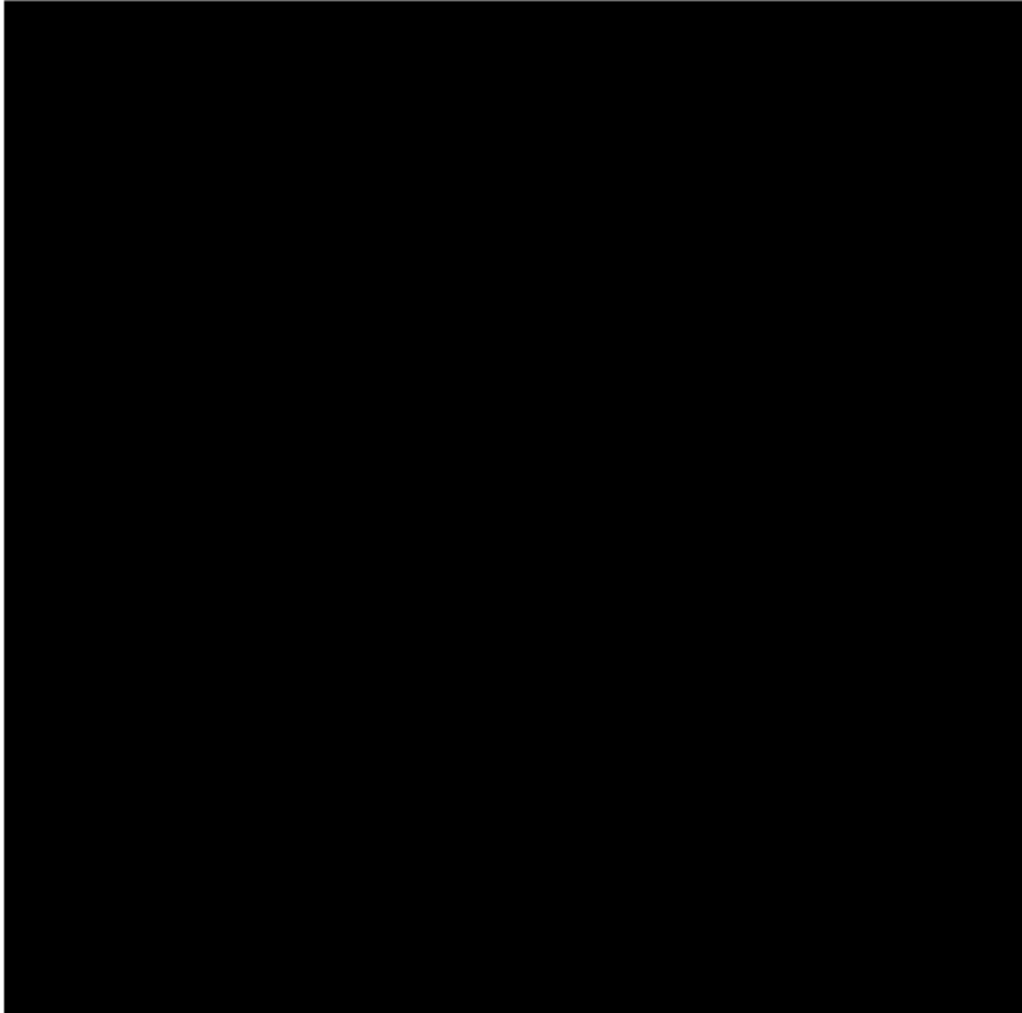
It is appreciated that a Planning Complaint may have been received and it is your duty to carry out an inspection as part of these allegations. Prior to a site visit being undertaken, which I can arrange with you, I would just summarise the present day position in respect of the 3 alleged breaches of Planning Control.

1. Positioning of caravan for residential occupation

The mobile home that is in situ at the property has been in place since the time Mr & Mrs Doe purchased the property. It was located there purely as an ancillary form of accommodation while they undertook extensive renovation work to the adjacent residential property which serves West Wantley Farm.

Upon completing the renovation works to the property the mobile home has since been used more for storage of residential paraphernalia with the odd occasion arising where guests and/or family members have used the bedroom in the mobile home purely to sleep there as the adjacent property only has 2 bedrooms. The principle use of the mobile home

is purely for ancillary residential storage. Any ancillary residential use is undertaken directly in conjunction with the adjacent residential property.



I trust that you will be able to support this proposal and on this matter I wait to hear further from you.

Yours sincerely

K C Potts

Independent Town Planning Services

Appendix C

Statutory Declaration for Mrs D Parfitt

STATUTORY DECLARATION

I, Debbie Parfitt of 1 West Wantley Cottages, Fryern Road, Storrington, RH20 4BJ, DO
SOLEMNLY AND SINCERELY DECLARE as follows:

1. I make this declaration from my own personal knowledge in support of an application for a Certificate of Lawfulness relating to the caravan situated within the curtilage of 1 West Wantley Cottages ("the Property").
2. I am the mother of Mrs Doe and have known Mr and Mrs Doe throughout their ownership of the Property, which they purchased on 27 June 2019.
3. I can confirm that a caravan was brought onto the land at the Property in July 2019 and has remained continuously in the same position from that date to the present day. I know this to be true because I visited the Property regularly from July 2019 onwards and have resided at the Property with my husband, Mr Peter Parfitt, from August 2019 to the present day.
4. From the time of its arrival in July 2019, the caravan has been used continuously as ancillary accommodation in connection with the main dwellinghouse at the Property. I personally observed this use during my visits and residence at the Property.
5. Initially, upon its arrival in July 2019, the caravan was occupied by Mr and Mrs Doe while renovation works were being carried out to the main dwellinghouse and was used for sleeping with access to washroom and cooking facilities still being in the property.
6. Following completion of those works, the caravan has continued to be used solely for purposes incidental and ancillary to the enjoyment of the main dwellinghouse. Occupation has been limited to family members associated with the main dwellinghouse. Parking and garden areas are shared with the main dwelling, and day-to-day domestic activities, including the preparation and consumption of main meals, take place within the main house.
7. At no time since July 2019 has the caravan been occupied or used as a separate or independent dwelling. It has not been let, sold, or occupied independently from the main dwellinghouse, does not have a separate postal address, and has at all times remained functionally and physically associated with the main dwellinghouse.
8. The caravan has remained in situ continuously since July 2019 and has throughout this period been connected to mains services including water and electricity. It has been stationed on the land in a fixed position being anchored to the ground and has not been moved or relocated since its original placement.

AND I make this solemn declaration conscientiously believing the same to be true and by virtue of the Statutory Declarations Act 1835.

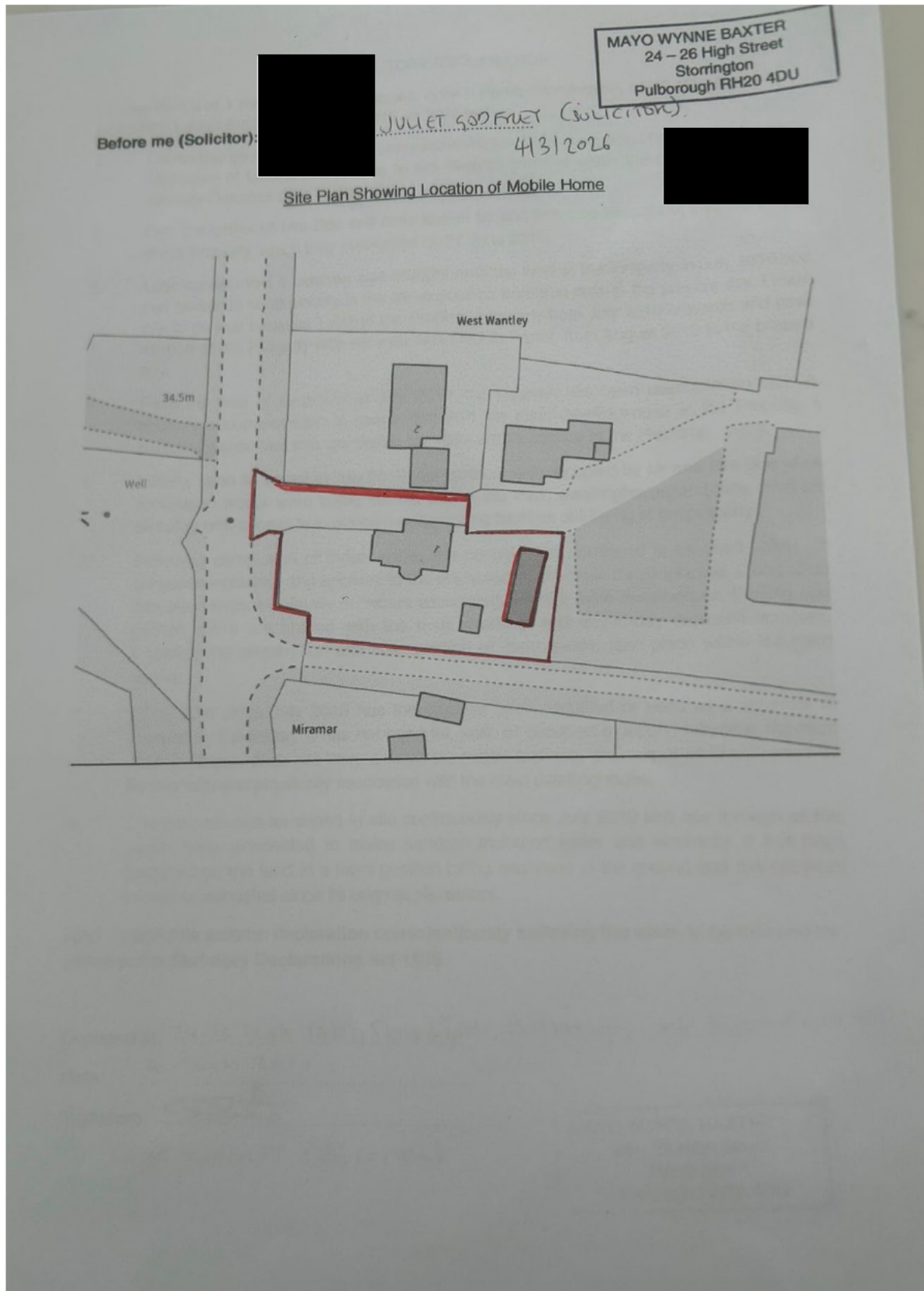
Declared at: 24-26 High Street, Storrington, Pulborough, West Sussex RH20 4DU

Date: 4 March 2026

Signature: [Redacted]

[Redacted] JULIE GODFREY (JANITOR)

MAYO WYNNE BAXTER
24 - 26 High Street
Storrington
Pulborough RH20 4DU



Appendix D

Statutory Declaration for Mr P Parfitt

STATUTORY DECLARATION

I, Peter Parfitt of 1 West Wantley Cottages, Fryern Road, Storrington, RH20 4BJ, DO
SOLEMNLY AND SINCERELY DECLARE as follows:

1. I make this declaration from my own personal knowledge in support of an application for a Certificate of Lawfulness relating to the caravan situated within the curtilage of 1 West Wantley Cottages ("the Property").
2. I am the father of Mrs Doe and have known Mr and Mrs Doe throughout their ownership of the Property, which they purchased on 27 June 2019.
3. I can confirm that a caravan was brought onto the land at the Property in July 2019 and has remained continuously in the same position from that date to the present day. I know this to be true because I visited the Property regularly from July 2019 onwards and have resided at the Property with my wife, Mrs Debbie Parfitt, from August 2019 to the present day.
4. From the time of its arrival in July 2019, the caravan has been used continuously as ancillary accommodation in connection with the main dwellinghouse at the Property. I personally observed this use during my visits and residence at the Property.
5. Initially, upon its arrival in July 2019, the caravan was occupied by Mr and Mrs Doe while renovation works were being carried out to the main dwellinghouse and was used for sleeping with access to washroom and cooking facilities still being in the property.
6. Following completion of those works, the caravan has continued to be used solely for purposes incidental and ancillary to the enjoyment of the main dwellinghouse. Occupation has been limited to family members associated with the main dwellinghouse. Parking and garden areas are shared with the main dwelling, and day-to-day domestic activities, including the preparation and consumption of main meals, take place within the main house.
7. At no time since July 2019 has the caravan been occupied or used as a separate or independent dwelling. It has not been let, sold, or occupied independently from the main dwellinghouse, does not have a separate postal address, and has at all times remained functionally and physically associated with the main dwellinghouse.
8. The caravan has remained in situ continuously since July 2019 and has throughout this period been connected to mains services including water and electricity. It has been stationed on the land in a fixed position being anchored to the ground and has not been moved or relocated since its original placement.

AND I make this solemn declaration conscientiously believing the same to be true and by virtue of the Statutory Declarations Act 1835.

Declared at: 24-26 High Street, Storrington, Pulborough, West Sussex RH20 4DU
Date: 4 March 2026
Signature: [Redacted]
JULIE GODFREY (SOLICITOR)

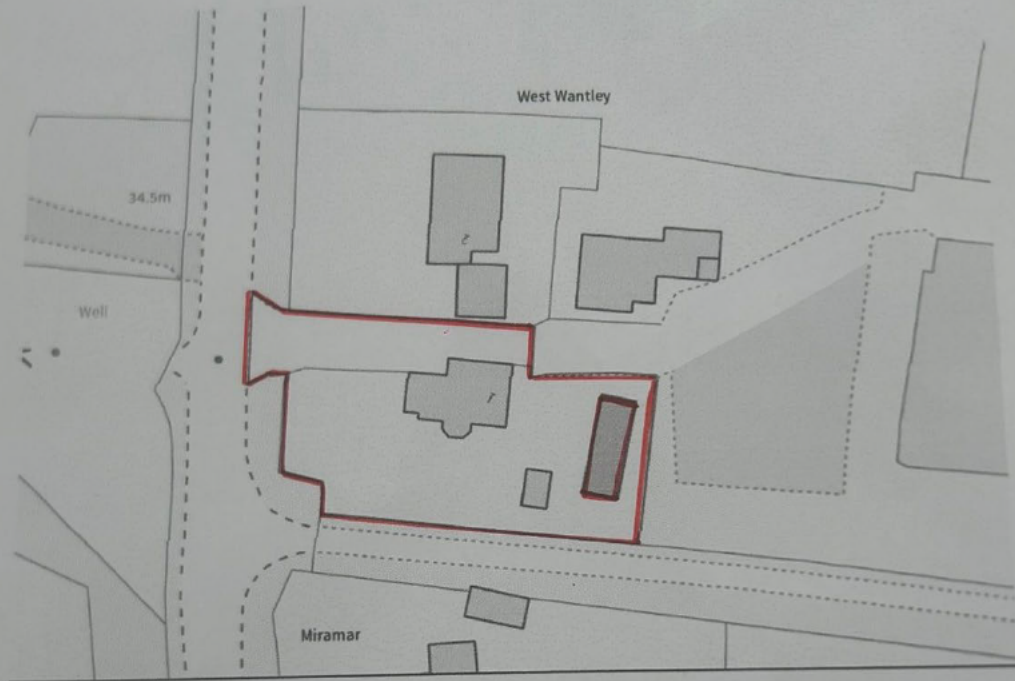
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MAYO WYNNE BAXTER
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Before me (Solicitor)

JULIET GODFREY (SOLICITOR) 4/3/2026

Site Plan Showing Location of Mobile Home



Appendix E

Statutory Declaration for Mr M Doe

STATUTORY DECLARATION

I, Mark Doe of West Wantley Farm, Fryern Road, Storrington, RH20 4BJ, DO SOLEMNLY AND SINCERELY DECLARE as follows:

1. I make this declaration from my own personal knowledge in support of an application for a Certificate of Lawfulness relating to the caravan situated within the curtilage of 1 West Wantley Cottages ("the Property").
2. I am the owner of 1 West Wantley Farm Cottages along with my wife Mrs Doe and who purchased the property on 27 June 2019.
3. I can confirm that a caravan was brought onto the land at the Property in July 2019 and has remained continuously in the same position from that date to the present day. I know this to be true because I purchased the caravan shortly after the completion of the purchase of 1 West Wantley Farm Cottages.
4. From the time of its arrival in July 2019, the caravan has been used continuously as ancillary accommodation in connection with the main dwellinghouse at the Property. I personally observed this use during my occupation and subsequent visits to the Property.
5. Initially, upon its arrival in July 2019, the caravan was occupied by myself and my wife while renovation works were being carried out to the main dwellinghouse and was used for sleeping with access to washroom and cooking facilities still being within the property.
6. Following completion of those works, the caravan has continued to be used solely for purposes incidental and ancillary to the enjoyment of the main dwellinghouse. Occupation has been limited to family members associated with the main dwellinghouse. Parking and garden areas are shared with the main dwelling, and day-to-day domestic activities, including the preparation and consumption of main meals, take place within the main house.
7. At no time since July 2019 has the caravan been occupied or used as a separate or independent dwelling. It has not been let, sold, or occupied independently from the main dwellinghouse, does not have a separate postal address, and has at all times remained functionally and physically associated with the main dwellinghouse.
8. The caravan has remained in situ continuously since July 2019 and has throughout this period been connected to mains services including water and electricity. It has been stationed on the land in a fixed position being anchored to the ground and has not been moved or relocated since its original placement.

AND I make this solemn declaration conscientiously believing the same to be true and by virtue of the Statutory Declarations Act 1835.

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Date: 4 March 2026

Signature: [Redacted]

[Redacted] JULIET GODFREY (SOLICITOR)

MAYO WYNNE BAXTER
24 - 26 High Street
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MAYO WYNNE BAXTER
24 - 26 High Street
Storrington
Pulborough RH20 4DU
Before me (Solicitor):

JULIET GODFREY (Solicitor) 4/3/2026.

Site Plan Showing Location of Mobile Home

